

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

CASE NO. 03-CR-10356-MLW

UNITED STATES

VS.

**FREDERICK A. SIMONE,
a/k/a FREDDY, a/k/a
THE NEIGHBOR,**

**VINCENT C. GIOCCHINI,
a/k/a DEE DEE; and**

**FRANCIS WHITE, a/k/a
THE WHITE-HAIRED GUY**

**MOTION TO FOR EXTENSION OF TIME TO FILE REPLIES TO
GOVERNMENT'S FILINGS, MOTION TO CONTINUE INITIAL HEARING RE:
DEFENDANT'S MOTION RE: FRANKS HEARING AND TO COMPEL
DISCLOSURE OF INFORMANT STATUS OF TARGETS**

Now comes the defendant, Frederick A. Simone, in the above numbered indictment and moves this Court for an order continuing the hearing of the above captioned matter which is presently scheduled for December 16, 2004 at 3:00 p.m. and to extend the time for replying to government's filings from December 10, 2004.

In support of the within motion the counsel for the defendant, Simone, annexes an affidavit in support hereof for consideration by this Honorable Court. The defendant requests that this Court continue the hearing on these motions to the week of December 27, 2004 or thereafter.

Frederick A. Simone
By his attorney

/s/ _____
Kevin J. Reddington, Esq.